

Bell Atlantic

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Bruce P. Beausejour

General Counsel - Massachusetts

April 14, 2000

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
Commonwealth of Massachusetts
One South Station
Boston, Massachusetts 02110

Re: Bell Atlantic-Massachusetts, D.T.E. 99-271

Dear Ms. Cottrell:

Bell Atlantic-Massachusetts ("BA-MA") is responding to the comments concerning AT&T's Motion to Adjust the Master Test Plan and to Clarify the Procedural Schedule filed on April 11, 2000 by various CLECs.¹ The comments predictably support AT&T's Motion but provide nothing in the way of facts or argument that distinguish them from the claims made by AT&T which BA-MA addressed in its April 11th comments. The Department should deny AT&T's Motion.

The bottom line here is that the processes KPMG is testing under the Master Test Plan – LSOG 3 for preordering and LSOG 2 for ordering – are now the predominate processes used by CLECs and will likely remain so for the foreseeable future. It is entirely appropriate for KPMG to test the guidelines CLECs are actually using and to evaluate BA-MA's capability to manage new releases, such as LSOG 4. As the Department correctly observed in its Letter Order of November 19, 1999, which rejected a previous effort by AT&T and others to require LSOG 4 testing: "[S]oftware change is inevitable and iterative and will remain so. How a BOC responds to this inescapable fact is ultimately more important than the characteristics of any particular OSS software version." The circumstances today have not changed in any material way from the time the Department first decided this issue.

With respect to AT&T's proposal that a 90-day period should be built into this proceeding after the KPMG report, the commenting participants scrupulously avoid mentioning that the Bell Atlantic-North systems are already handling their commercial volumes. Thus, there is no need for the Department to await the development of such volumes to have data relating to the operation of the systems based on actual experience. Indeed, substantial data on the operational performance of BA-MA's OSS have already been filed with the Department and reviewed in this proceeding, and Bell

¹ The following participants filed comments on AT&T's Motion: Competitive Telecommunications Association, Rhythms, MCI WorldCom, Telecommunications Resellers Association, RCN BecoCom, and Covad Communications Company.

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Atlantic is regularly reporting performance data to both the Federal Communications Commission and the New York Public Service Commission. The extensive data that already exists and additional information that will be presented during the further portions of this case will enable the Department fully and accurately to gauge BA-MA's performance. The establishment of an additional period to examine performance is simply a ploy to extend the date of BA-MA's Section 271 relief and should be rejected by the Department.

Sincerely,

Bruce P. Beausejour

cc: Chairman James Connelly, Esq.
Commissioner W. Robert Keating
Commissioner, Deirdre K. Manning
Commissioner Eugene J. Sullivan, Jr.
Commissioner Paul Vasington
Hearing Officer Cathy Carpino
Hearing Officer Tina Chin
Michael Isenberg, Esq., Director, Telecommunications Division
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